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Attorneys for Defendants,

**DON C. KEENAN, D.C. KEENAN & ASSOCIATES, P.A. D/B/A KEENAN LAW FIRM,
AND WILLIAM ENTREKIN**

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SEAN K. CLAGGETT & ASSOCIATES, LLC
D/B/A CLAGGETT & SYKES LAW FIRM, A
NEVADA LIMITED LIABILITY COMPANY;
SEAN K. CLAGGETT, AND INDIVIDUAL,

Plaintiff,

vs.

DON C. KEENAN, AN INDIVIDUAL; D.C.
KEENAN & ASSOCIATES, P.A. D/B/A
KEENAN LAW FIRM, A GEORGIA
PROFESSIONAL ASSOCIATION; KEENAN'S
KIDS FOUNDATION, INC., D/B/A KEENAN
TRIAL INSTITUTE AND/OR THE KEENAN
EDGE, A GEORGIA NON-PROFIT
CORPORATION; BRIAN F. DAVIS, AN
INDIVIDUAL; DAVIS LAW GROUP, P.A., A
NORTH CAROLINA PROFESSIONAL
ASSOCIATION; DAVID J. HOEY, AN
INDIVIDUAL; TRAVIS E. SHELTER, AN
INDIVIDUAL; WILLIAM ENTREKIN, AN
INDIVIDUAL; DOES I-X; AND ROE
BUSINESS ENTITIES XI-XX, INCLUSIVE,

Defendants.

CASE NO. 2:21-cv-02237-GMN-DJA

**DEFENDANTS DON C. KEENAN,
D.C. KEENAN & ASSOCIATES,
P.A. D/B/A KEENAN LAW FIRM
AND WILLIAM ENTREKIN'S
NUNC PRO TUNC JOINDER TO
DEFENDANTS KEENAN'S KIDS
FOUNDATION, INC., AND DAVID
J. HOEY'S OPPOSITION TO
PLAINTIFFS' MOTION TO
REMAND [ECF NO. 23]**

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**DEFENDANTS DON C. KEENAN, D.C. KEENAN & ASSOCIATES, P.A. D/B/A
KEENAN LAW FIRM AND WILLIAM ENTREKIN'S NUNC PRO TUNC JOINDER TO
DEFENDANTS KEENAN'S KIDS FOUNDATION, INC., AND DAVID J. HOEY'S
OPPOSITION TO PLAINTIFFS' MOTION TO REMAND [ECF NO. 23]**

Defendants DON C. KEENAN ("Keenan") D.C. KEENAN & ASSOCIATES, P.A. d/b/a KEENAN LAW FIRM ("Keenan Law Firm") and WILLIAM ENTREKIN (Entrekin) hereby Nunc Pro Tunc joins in KEENAN'S KIDS FOUNDATION, INC. and DAVID J. HOEY's Opposition to Plaintiffs' Motion to Remand [ECF No. 23] filed on January 28, 2022 (the "Opposition to Motion to Remand").

Keenan, Kennan Law Firm and Entrekin hereby adopt and incorporate herein by reference the Memorandum Points and Authorities and all arguments therein that was submitted with the Opposition to Motion to Remand.

If for any reason the Opposition to Motion to Remand becomes moot or is withdrawn, this Joinder shall serve as its own stand-alone Opposition to Motion to Remand. This Joinder is made based upon the pleadings and papers on file herein with the Court, and any oral argument of counsel which may be heard at the time of the hearing on the Motion to Remand

DATED this 22nd day of February 2022.

**GORDON REES SCULLY
MANSUKHANI LLP**

/s/ Robert E. Schumacher
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